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March 10, 2016

The Honorable Thomas Wheeler, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: In the Matter of Revitalization of the AM Radio Service
MB Docket No. 13-249, Further Notice of Proposed Rulemaking

Dear Mr. Chairman:

I write to express the Seattle Mariners' serious concern about the Commission's proposal to reduce substantially the interference protections to Class A AM radio stations contained in its Further Notice of Proposed Rulemaking to revitalize the AM radio service. The Commission's proposal, if adopted, would deprive countless loyal and vocal Mariners fans of their ability to listen to our radio broadcasts on Station KIRO-AM. The broadcasts of those games would be subject to so much interference under the proposed rules that listening across significant portions of our fan base either would be physically impossible or so impeded by interference that fans would tune out.

In addition to being committed to fielding the best team that we possibly can, one of our highest priorities is to ensure that our fans have easy and dependable access to the games we play. Over many decades, there has been no more sure way to provide that enjoyment to our fans than through free, over-the-air radio that reaches throughout the listening area of large Class A AM stations. Our "local" fan base is not limited to the vicinity of our home field or to the proximate location of the radio station that broadcasts our games; our "home town" fans stretch literally across hundreds of miles. These distant fans are committed to us, and we have an obligation to serve them. The Commission's proposed new interference rules would undermine that obligation.



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Radio station KIRO-AM has been broadcasting our games for the past seven seasons, and for 24 of the past 30 seasons. Fans from all across our state and region are accustomed to tuning in to our games on that station. Our identities are connected in the minds of listeners. In a world of incessant change and ferment, consumers find some comfort in having their expectations fulfilled. The Commission's proposal to reduce interference protections to Class A AM radio stations that broadcast not only our games but the overwhelming majority of games around the country cut directly in the opposite direction, disrupting consumers' listening experience by literally drowning them in interference. This type of regulation causing tangible and palpable harm to consumers without obvious consumer benefits is precisely the type of government action causing consternation among many Americans.

Finally, the proposed changes to the interference rules, if adopted, would be contrary to certain basic assumptions governing our relationships and contractual arrangements with Station KIRO-AM. When we enter into broadcasting rights agreements, we always consider the coverage area of the broadcasting station. The reach of that station is important in determining key terms of the rights agreement as well as the need, if any, to supplement coverage. The proposed interference rules changes inject uncertainty into very stable relationships and might well require renegotiation of existing contracts.

For all of the above reasons, we urge the Commission not to adopt the interference rules changes proposed in its Further Notice of Proposed Rulemaking.

Sincerely,



Bart Waldman

cc: Carl Gardner, Bonneville Seattle Media Group